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Attorneys for Defendant RAMON DESAGE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
RAMON DESAGE,)
)
Defendant.)

Case No.: 2:13-cr-00039-JAD-VCF

**AMENDED UNOPPOSED MOTION TO
TRAVEL AND PROPOSED ORDER**

Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright, Esquire and Richard B. Herman, Esquire, and hereby moves this Court for permission to amend travel dates from Las Vegas, Nevada to New York City to August 16, 2015 and returning on August 18, 2015. While in New York City, Mr. Desage will be meeting with attorneys and he will be staying at the St. Regis Hotel, 2 East 55th Street, New York, New York. The Court on August 11, 2015 approved Mr. Desage's initial travel motion; unfortunately, Mr. Desage's meeting in New York was cancelled and we are trying to reschedule with the Court's approval.

On August 10, 2015, Richard B. Herman, Counsel for Mr. Desage, personally discussed Mr. Desage's initial travel request with Pre-Trial Services Officer Zack Bowen, who advises he consents to this travel request. Mr. Herman provided Officer Bowen with Mr. Desage's travel itinerary and

1 hotel information. Mr. Desage will continue with electronic monitoring and will abide by all other
2 bail conditions. Upon his return to Las Vegas on August 18, 2015, Mr. Desage will give a courtesy
3 call to Officer Bowen.

4 Counsel for Mr. Desage has discussed the initial request with Assistant United States
5 Attorney Gregory Damm, who has no opposition to it.

6 DATED this 12th day of August 2015.

7
8 Respectfully submitted:

9 BY /s/ Richard A. Wright
10 RICHARD A. WRIGHT, ESQUIRE
300 S. Fourth Street
Suite 701
11 Las Vegas, NV 89101
Telephone: (702) 382-4004
12 Attorney for Defendant, Ramon Desage

13 BY /s/ Richard B. Herman
14 RICHARD B. HERMAN, ESQUIRE
New York Bar No. 1898758
445 Park Avenue
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15 New York, NY 10022
Telephone: (212) 759-6300
16 Attorney for Defendant, Ramon Desage
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20 **ORDER**

21 This matter having come before the Court on the amended unopposed motion of Defendant
22 Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to New
23 York City on August 16, 2015 and returning August 18, 2015 is **GRANTED**.
24

25 DATED: August 12, 2015.

26 
HONORABLE JENNIFER A. DORSEY
27

28 Respectfully submitted by:

1 WRIGHT STANISH & WINCKLER

2 /s/ Richard A. Wright
3 RICHARD A. WRIGHT

4 RICHARD B. HERMAN, P.C.

5 /s/ Richard B. Herman
6 RICHARD B. HERMAN

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